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Attorneys for Plaintiff
UNITED STATES OF AMERICA

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,)	CR. NO. 03-00519 DAE
)	
Plaintiff,)	MOTION TO WITHDRAW
)	SPECIAL INFORMATION
vs.)	FILED UNDER TITLE 21,
)	U.S.C. SECTION 851
DOUGLAS KEOLA GONSALVES,)	
)	Date: June 2, 2006
Defendant.)	Time: 2:15 p.m.
<hr/>)	Judge: David A. Ezra

MOTION TO WITHDRAW SPECIAL INFORMATION
FILED UNDER TITLE 21, U.S.C. SECTION 851

Pursuant to Rule 48(a) of the Federal Rules of Criminal Procedure and by leave of court, the United States of America, through Assistant U.S. Attorney Loretta Sheehan, moves this Court to dismiss the Special Information filed pursuant to Title 21, United States Code, Section 851 against Douglas Keola Gonsalves, should the Court accept the Memorandum of Plea Agreement.

The Defendant, Douglas Keola Gonsalves, pleaded guilty to the single-count Indictment on November 28, 2005, pursuant to a Memorandum of Plea Agreement. In the Memorandum of Plea Agreement, the government agreed to move to dismiss the Special Information filed under Title 21, United States Code, Section 851 prior to sentencing. In order to comport to the terms of the plea agreement, the government now moves this Honorable Court to dismiss the Special Information filed in this case.

DATED: May 22, 2006, at Honolulu, Hawaii.

EDWARD H. KUBO, JR.
United States Attorney
District of Hawaii

By /s/ Loretta Sheehan
LORETTA SHEEHAN
Assistant U.S. Attorney

Leave of Court is granted for the filing of the foregoing dismissal.

DATED: Honolulu, Hawaii, May 31, 2006.

A handwritten signature in black ink, appearing to read "David Alan Ezra".

David Alan Ezra
United States District Judge

CERTIFICATE OF SERVICE

I hereby certify that, on the dates and by the methods of service noted below, a true and correct copy of the foregoing was served on the following at their last known address:

Served Electronically through CM/ECF:

Cynthia A. Kagiwada
c_kagiwada@hotmail.com

May 22, 2006

Attorney for Defendant
DOUGLAS KEOLA GONSALVES

Served by Hand-Delivery:

U.S. Probation Office
Attn: Mona L. Godinet
300 Ala Moana Blvd., Room C-110
Honolulu, Hawaii 96850

May 22, 2006

DATED: May 22, 2006, at Honolulu, Hawaii.

/s/ Iris Tanaka